

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Northern States Power Corporation (Xcel Energy)

Project No. 2056-016

COMMENTS ON THE DRAFT ENVIRONMENTAL
ASSESSMENT

1. FERC Staff-Recommended Measures

The City welcomes the additional mitigation measures recommended by the FERC. In particular the City is happy to see that FERC staff have recommended the relocation of the Pillsbury substation and the diversion of water adequate to provide an aesthetic flow over the last remaining bluff of St. Anthony Falls.

Additionally, while the City recognizes the FERC staff recommendation to remove the Lower Development from the scope of the project, the City is disappointed with the recommendation that nothing be done for the recreational development of the Lower Falls and whitewater park. We would encourage at a minimum that Xcel formalize their donation offer of the lower land for the whitewater park.

2. Water Quality: Trash Disposal

Regarding the FERC recommendation for the development of a plan to collect and convey trash removed by the Projects trash racks for off-site disposal, the City would be

happy to participate in any planning discussion that further enhances water quality in the Mississippi River. However, the City does not anticipate entering into a cost sharing arrangement with Xcel for off site trash-disposal. Such costs should be considered part of the project's economics.

3. Aesthetic Resources: Water over St. Anthony Falls

In the EA, FERC indicates that it analyzed the appearance of flows over the falls (via photos) ranging from 250 to 18,500 cfs, concluding that Xcel's proposal to provide 100 cfs over the falls during daylight hours is sufficient for aesthetic purposes. The City and Park Board share the contention that 2,000 cfs is needed to fully provide aesthetic flows. The City is not aware that the FERC has examined the appearance of any flows under 250 cfs in order to make a determination that 100cfs is aesthetically adequate.

The FERC has also recommended that Xcel develop a plan to monitor and document "the minimum surface covering flow during each month from March through November for 2 years." This plan would be developed in consultation with the DNR, NPS, FMR and the Minneapolis Park Board. However, the City is not included in the consulting group. Our understanding of the purpose of this monitoring would be "to verify the adequacy of the proposed minimum surface covering flow." The EA doesn't state what would happen when the monitoring is complete. It also doesn't indicate how Xcel's maintenance of 100cfs over the falls interacts with Crown's ability to dry up the falls entirely during July and August.

In Conclusion

The City of Minneapolis believes that more can be done to more fully realize the inherent aesthetic, recreational and historic/interpretive opportunities that St. Anthony Falls provides.

Dated:

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